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June 25, 2024

VIA ECF

The Honorable Dale E. Ho, U.S.D.J.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Application **GRANTED**. The parties shall file their summary judgment motions and motions to seal in accordance with the unified briefing schedule proposed in the endorsed letter. So Ordered.



Dale E. Ho
United States District Judge
Dated: June 26, 2024
New York, New York

Re: *Watson v. NY Doe 1 et al.*
Case No.: 1:19-cv-00533-DEH-VF

Dear Judge Ho,

We represent Defendant/Counterclaimant Illinois Doe 1 (“Illinois Doe 1”) in this case. We write to respectfully request a modification of the briefing schedule on the anticipated summary judgment motions.

We request an extension of time of twenty-one (21) days to submit Illinois Doe 1’s summary judgment motion. This extension of time is required because of circumstances affecting the remaining two (2) attorneys of record for Illinois Doe 1. The undersigned’s co-counsel has been and remains on leave. The undersigned had a death in his family that necessitated his taking some time away.

We have conferred with counsel for Defendant/Counterclaimant NY Doe 2 (“NY Doe 2”) and counsel for Plaintiff Ralph Watson (“Plaintiff”) regarding our intended request. NY Doe 2 is prepared to file her opening motion papers on the current deadline but does not oppose the request in the interest of maintaining a unified briefing schedule for all parties’ summary judgment motions. While Plaintiff contends that both summary judgment motions have no reasonably objective chance of success, he does not oppose the proposed extension based on the death in counsel’s family, although he strongly prefers that a unified briefing schedule be maintained. The parties agree that if this requested extension should be granted, the entire briefing schedule should be modified accordingly.

The existing briefing schedule, per the Court’s memo endorsement (ECF No. 267), as supplemented by the Court’s recent memo endorsement on sealing procedures (ECF No. 270), and the proposed modifications are set forth below:

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Doe Defendants shall each file their anticipated motions for summary judgment by June 28, 2024 (*July 19, 2024*)

Plaintiff shall file a cross-motion for summary judgment with respect to his claim against Illinois Doe 1 by July 26, 2024 (*August 16, 2024*)

Defendant NY Doe 2 shall file a reply in support of her motion for summary judgment, and Illinois Doe 1 shall file a reply in support of her motion for summary judgment and in opposition to Plaintiff's cross-motion for summary judgment by August 16, 2024 (*September 6, 2024*)

Plaintiff shall file a reply in further support of his cross-motion for summary judgment by August 30, 2024 (*September 20, 2024*)

Parties may each file a letter on ECF stating what portions, if any, of the summary judgment record that party seeks to maintain under seal by September 27, 2024 (*October 18, 2024*)

We greatly appreciate the Court's attention to this matter and are available at the Court's convenience should it have any questions.

Respectfully submitted,

/s/ David J. Grech

David J. Grech

GORDON REES
SCULLY MANSUKHANI, LLP

*Attorneys for Defendant/Counterclaimant
Illinois Doe 1*

Cc.: All Attorneys of Record (via ECF)